

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

**SECURITIES AND EXCHANGE
COMMISSION,**

Plaintiff,

-against-

**ROBERT J. MUELLER, DEEPROOT FUNDS
LLC (a/k/a dprt Funds, LLC), AND POLICY
SERVICES INC.,**

Defendants,

-and-

**DEEPROOT TECH LLC, DEEPROOT
PINBALL LLC, DEEPROOT STUDIOS LLC,
DEEPROOT SPORTS & ENTERTAINMENT
LLC, DEEPROOT RE 12621 SILICON DR LLC,
AND ROBERT J. MUELLER, JEFFREY L.
MUELLER, AND BELINDA G. BREEN, AS CO-
TRUSTEES OF THE MB HALE OHANA
REVOCABLE TRUST,**

Relief Defendants.

Civil Action No.: 5:21-cv-785-XR

**JOINT MOTION FOR
CONFIDENTIALITY AND PROTECTIVE ORDER**

Pursuant to Fed. R. Civ. P. 26(c) and Local Rule CV-26, Plaintiff Securities and Exchange Commission, Defendant Robert J. Mueller, and Relief Defendants Jeffrey L. Mueller and Belinda G. Breen, as Co-Trustees of the MB Hale Ohana Revocable Trust, jointly file this Motion for Entry of a Confidentiality and Protective Order.

This case involves documents that include confidential information, including personally identifiable information, banking and financial information, and potentially sensitive business and intellectual property information of the parties and third parties. The proposed Confidentiality and Protective Order (attached hereto as Exhibit A) specifies the conditions under which

confidential information will be exchanged and used in this litigation and is justified under Rule 26(c). Counsel for Plaintiff has conferred with counsel for the Bankruptcy Trustee responsible for the entity Defendants and Relief Defendants, who indicated they have no objection to this Motion.

Date: March 29, 2022

Respectfully submitted,

/s/ David A. Nasse

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Attorneys for Relief Defendants

Jeffrey L. Mueller and Belinda G. Breen

CERTIFICATE OF SERVICE

I certify that on the 29th day of March, 2022, a true and correct copy of the foregoing document was filed electronically through the Court's CM/ECF system, which will send copies to all counsel of record.

/s/ David A. Nasse _____

David A. Nasse

*Counsel for Plaintiff United States Securities
and Exchange Commission*